

Clinton Brown
16821 Edgar Street
Pacific Palisades, CA 90272
310-487-6453
Plaintiff in Pro Per



Note: The court cannot refuse to accept a filing because of formatting errors. Fed. R. Civ. P. 5(d)(4).

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

CLINTON BROWN,
Plaintiff,

vs.

CLARK R. TAYLOR. AICP, THE
LOS ANGELES COUNTY
DEPARTMENT OF REGIONAL
PLANNING,
Defendant.

Case No.: 2:22-CV-09203-MEMF-KS

Request for Entry of Default

Judge: Maame Ewusi-Mensah

Frimpong

Magistrate Judge: Karen L.
Stevenson

REQUEST FOR ENTRY OF DEFAULT

NOTICE TO THE COURT, "to be awarded a default judgment, the moving party first must request a Clerk's entry of default against the party who fails to plead or otherwise defend. Fed. R. Civ. P. 55(a); *Garrett v. Seymour*, 217 Fed. Appx. 835, 838 (10th Cir. 2007) (explaining Clerk's entry of default is "prerequisite for the entry of a default judgment"). Then, after entry of default, "the [moving] party must apply to the court for a default judgment." Fed. R. Civ. P. 55(b)(2)

1 Rule 4 of the Federal Rules of Civil Procedure states that the defendant must
2 serve an answer or motion within the time specified in the summons. Rule
3 71.1(d)4 states that delivering the notice to the clerk and serving it have the
4 same effect as serving a summons under Rule 4. If the defendant fails to
5 respond to the summons, the clerk may enter a default judgment against the
6 defendant in accordance with Rule 55(a) of the Federal Rules of Civil
7 Procedure. Additionally, Rule 71.1(d) provides that a defendant waives all
8 objections and defenses not stated in its answer and no other pleading or
9 motion asserting an additional objection or defense are allowed in eminent
10 domain cases. *The application for default judgment in the amount of*
11 *\$32,400,000 will be filed after the request for entry of default has been*
12 *entered.* (Emphasis added)

13
14 In summary, the defaulting party was properly served with the complaint or
15 other pleading seeking affirmative relief, the defaulting party has failed to
16 serve or file a responsive pleading or motion and the applicable time for
17 serving a responsive pleading or motion, including any extensions, has
18 expired.

19
20 **THEREFORE**, Plaintiff requests entry of default.

21
22 “I declare (or certify, verify, or state) under penalty of perjury under the laws
23 of the United States of America that the foregoing is true and correct.

24
25 
26

27 Clinton Brown

1/13/2022